

1 MICHAEL B. SHORTNACY
 2 mshortnacy@shb.com
 3 **SHOOK, HARDY & BACON L.L.P.**
 4 2121 Avenue of the Stars, Suite 1400
 5 Los Angeles, CA 90067
 6 Telephone: (424) 285-8330
 7 Facsimile: (424) 204-9093

8 *Attorney for Defendants*
 9 UBER TECHNOLOGIES, INC.,
 10 RASIER, LLC, and RASIER-CA, LLC

11 **UNITED STATES DISTRICT COURT**

12 **NORTHERN DISTRICT OF CALIFORNIA**

13 **SAN FRANCISCO DIVISION**

14
 15 IN RE: UBER TECHNOLOGIES, INC.,
 16 PASSENGER SEXUAL ASSAULT
 17 LITIGATION

18
 19 This Document Relates to:

20
 21 *Jane Doe LS 293 v. Uber Technologies,
 22 Inc., et al., No. 3:23-cv-04364-CRB*

23
 24 *Jane Doe LS 231 v. Uber Technologies,
 25 Inc., et al., No. 3:23-cv-04367-CRB*

26
 27 *Jane Doe LS 144 v. Uber Technologies,
 28 Inc., et al., No. 3:23-cv-04388-CRB*

29
 30 *Jane Doe LS 112 v. Uber Technologies,
 31 Inc., et al., No. 3:23-cv-05286-CRB*

32
 33 *Jane Doe LS 284 v. Uber Technologies,
 34 Inc., et al., No. 3:23-cv-05363-CRB*

35
 36 *Jane Doe LS 126 v. Uber Technologies,
 37 Inc., et al., No. 3:23-cv-05370-CRB*

38 Case No. 3:23-md-03084-CRB

39 **DECLARATION OF
 40 MICHAEL B. SHORTNACY
 41 REGARDING PLAINTIFFS
 42 NOT IN COMPLIANCE
 43 WITH THE COURT'S
 44 MARCH 26, 2025 ORDER**

45 Judge: Hon. Charles R. Breyer
 46 Courtroom: 6-17th Floor

1 *Jane Doe LS 265 v. Uber Technologies,
2 Inc., et al., No. 3:23-cv-05377-CRB*

3 *Jane Doe LS 200 v. Uber Technologies,
4 Inc., et al., No. 3:23-cv-05387-CRB*

5 *Jane Doe LS 66 v. Uber Technologies,
6 Inc., et al., No. 3:23-cv-05414-CRB*

7 *Jane Doe LS 317 v. Uber Technologies,
8 Inc., et al., No. 3:23-cv-05424-CRB*

9 *Jane Doe LS 234 v. Uber Technologies,
10 Inc., et al., No. 3:23-cv-05433-CRB*

11 *Jane Doe LS 191 v. Uber Technologies,
12 Inc., et al., No. 3:23-cv-05573-CRB*

13 *Jane Doe LS 273 v. Uber Technologies,
14 Inc., et al., No. 3:23-cv-05946-CRB*

15 *Jane Doe LS 470 v. Uber Technologies,
16 Inc., et al., No. 3:24-cv-05207-CRB*

17 *Jane Doe LS 232 v. Uber Technologies,
18 Inc., et al., No. 3:24-cv-05327-CRB*

19 *Jane Doe LS 373 v. Uber Technologies,
20 Inc., et al., No. 3:24-cv-05328-CRB*

21 *Jane Doe LS 462 v. Uber Technologies,
22 Inc., et al., No. 3:24-cv-05329-CRB*

23 *Jane Doe LS 226 v. Uber Technologies,
24 Inc., et al., No. 3:24-cv-05330-CRB*

25 *Jane Doe LS 166 v. Uber Technologies,
26 Inc., et al., No. 3:24-cv-05331-CRB*

27 *Jane Doe LS 122 v. Uber Technologies,
28 Inc., et al., No. 3:24-cv-05332-CRB*

1 *Jane Doe LS 202 v. Uber Technologies,
2 Inc., et al., No. 3:24-cv-05333-CRB*

3 *Jane Doe LS 416 v. Uber Technologies,
4 Inc., et al., No. 3:24-cv-05335-CRB*

5 *Jane Doe LS 305 v. Uber Technologies,
6 Inc., et al., No. 3:24-cv-05338-CRB*

7 *Jane Doe LS 201 v. Uber Technologies,
8 Inc., et al., No. 3:24-cv-05354-CRB*

9 *Jane Doe LS 189 v. Uber Technologies,
10 Inc., et al., No. 3:24-cv-05379-CRB*

11 *Jane Doe LS 272 v. Uber Technologies,
12 Inc., et al., No. 3:24-cv-05390-CRB*

13 *Jane Doe LS 199 v. Uber Technologies,
14 Inc., et al., No. 3:24-cv-05402-CRB*

15 *Jane Doe LS 279 v. Uber Technologies,
16 Inc., et al., No. 3:24-cv-05420-CRB*

17 *Jane Doe LS 139 v. Uber Technologies,
18 Inc., et al., No. 3:24-cv-05527-CRB*

19 *Jane Doe LS 487 v. Uber Technologies,
20 Inc., et al., No. 3:24-cv-05611-CRB*

21 *Jane Doe LS 141 v. Uber Technologies,
22 Inc., et al., No. 3:24-cv-05634-CRB*

23 *Jane Doe LS 423 v. Uber Technologies,
24 Inc., et al., No. 3:24-cv-05676-CRB*

25 *Jane Doe LS 491 v. Uber Technologies,
26 Inc., et al., No. 3:24-cv-05678-CRB*

27 *Jane Doe LS 441 v. Uber Technologies,
28 Inc., et al., No. 3:24-cv-05751-CRB*

1 *Jane Doe LS 518 v. Uber Technologies,
2 Inc., et al., No. 3:24-cv-05761-CRB*

3 *Jane Doe LS 319 v. Uber Technologies,
4 Inc., et al., No. 3:24-cv-05800-CRB*

5 *Jane Doe LS 484 v. Uber Technologies,
6 Inc., et al., No. 3:24-cv-05824-CRB*

7 *Jane Doe LS 4 v. Uber Technologies, Inc.,
8 et al., No. 3:24-cv-05861-CRB*

9 *Jane Doe LS 368 v. Uber Technologies,
10 Inc., et al., No. 3:24-cv-05898-CRB*

11 *Jane Doe LS 274 v. Uber Technologies,
12 Inc., et al., No. 3:24-cv-05902-CRB*

13 *Jane Doe LS 359 v. Uber Technologies,
14 Inc., et al., No. 3:24-cv-05908-CRB*

15 *Jane Doe LS 342 v. Uber Technologies,
16 Inc., et al., No. 3:24-cv-05913-CRB*

17 *Jane Doe LS 304 v. Uber Technologies,
18 Inc., et al., No. 3:24-cv-05914-CRB*

19 *Jane Doe LS 369 v. Uber Technologies,
20 Inc., et al., No. 3:24-cv-05915-CRB*

21 *Jane Doe LS 269 v. Uber Technologies,
22 Inc., et al., No. 3:24-cv-05922-CRB*

23 *Jane Doe LS 93 v. Uber Technologies,
24 Inc., et al., No. 3:24-cv-05925-CRB*

25 *Jane Doe LS 7 v. Uber Technologies, Inc.,
26 et al., No. 3:24-cv-05926-CRB*

27 *Jane Doe LS 504 v. Uber Technologies,
28 Inc., et al., No. 3:24-cv-05928-CRB*

1 *Jane Doe LS 180 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05936-CRB*

2 *Jane Doe LS 119 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05937-CRB*

3 *Jane Doe LS 197 v. Uber Technologies,
Inc., et al., No. 3:24-cv-06003-CRB*

4 *Jane Doe LS 314 v. Uber Technologies,
Inc., et al., No. 3:24-cv-06016-CRB*

5 *Jane Doe LS 188 v. Uber Technologies,
Inc., et al., No. 3:24-cv-06022-CRB*

6 *Jane Doe LS 230 v. Uber Technologies,
Inc., et al., No. 3:24-cv-06026-CRB*

7 *Jane Doe LS 209 v. Uber Technologies,
Inc., et al., No. 3:24-cv-06033-CRB*

8 *Jane Doe LS 532 v. Uber Technologies,
Inc., et al., No. 3:24-cv-06927-CRB*

9 *Jane Doe LS 534 v. Uber Technologies,
Inc., et al., No. 3:24-cv-07142-CRB*

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, CA. I respectfully submit this declaration identifying the plaintiffs that are not in compliance with the Court's March 26, 2025 Order.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am a member in good standing of the Bars of the State of California, the State of New York, and the District of Columbia. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so.

3. On March 26, 2025, the Court ordered each Plaintiff subject to Uber's Motion to Dismiss Levin Simes Cases for Failure to Comply with Discovery Orders to provide a complete and verified Plaintiff Fact Sheet within 14 days of the Order. The Order therefore compelled compliance by each Plaintiff subject to the Order by April 9, 2025.

4. The Court also ordered counsel for Uber to submit a declaration within 21 days of the Order (i.e., by April 16, 2025), identifying which, if any, Plaintiffs did not comply with the Court’s Order.

5. On April 11, 2025, counsel for Uber reviewed MDL Centrality to determine which Plaintiffs subject to the Court’s March 26, 2025 Order failed to provide a complete and verified Plaintiff Fact Sheet by April 9, 2025 as ordered by the Court.

6. Based on counsel for Uber's review of MDL Centrality, the following Plaintiffs failed to provide a complete and verified Plaintiff Fact Sheet by April 9, 2025 as ordered by the Court:

Case Name	Case No.
<i>Jane Doe LS 293 v. Uber Technologies, Inc., et al.</i>	3:23-cv-04364-CRB
<i>Jane Doe LS 231 v. Uber Technologies, Inc., et al.</i>	3:23-cv-04367-CRB

1	<i>Jane Doe LS 231 v. Uber Technologies, Inc., et al.</i>	3:23-cv-04367-CRB
2	<i>Jane Doe LS 144 v. Uber Technologies, Inc., et al.</i>	3:23-cv-04388-CRB
3	<i>Jane Doe LS 122 v. Uber Technologies, Inc., et al.</i>	3:23-cv-05286-CRB
4	<i>Jane Doe LS 284 v. Uber Technologies, Inc., et al.</i>	3:23-cv-05363-CRB
5	<i>Jane Doe LS 126 v. Uber Technologies, Inc., et al.</i>	3:23-cv-05370-CRB
6	<i>Jane Doe LS 265 v. Uber Technologies, Inc., et al.</i>	3:23-cv-05377-CRB
7	<i>Jane Doe LS 200 v. Uber Technologies, Inc., et al.</i>	3:23-cv-05387-CRB
8	<i>Jane Doe LS 66 v. Uber Technologies, Inc., et al.</i>	3:23-cv-05414-CRB
9	<i>Jane Doe LS 317 v. Uber Technologies, Inc., et al.</i>	3:23-cv-05424-CRB
10	<i>Jane Doe LS 273 v. Uber Technologies, Inc., et al.</i>	3:23-cv-05946-CRB
11	<i>Jane Doe LS 470 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05207-CRB
12	<i>Jane Doe LS 373 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05328-CRB
13	<i>Jane Doe LS 462 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05329-CRB
14	<i>Jane Doe LS 226 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05330-CRB
15	<i>Jane Doe LS 166 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05331-CRB
16	<i>Jane Doe LS 122 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05332-CRB
17	<i>Jane Doe LS 202 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05333-CRB
18	<i>Jane Doe LS 416 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05335-CRB
19	<i>Jane Doe LS 201 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05354-CRB
20	<i>Jane Doe LS 189 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05379-CRB
21	<i>Jane Doe LS 272 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05390-CRB
22	<i>Jane Doe LS 279 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05420-CRB
23	<i>Jane Doe LS 487 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05611-CRB
24	<i>Jane Doe LS 141 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05634-CRB
25	<i>Jane Doe LS 423 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05676-CRB
26	<i>Jane Doe LS 491 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05678-CRB
27	<i>Jane Doe LS 441 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05751-CRB
28		

1	<i>Jane Doe LS 319 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05800-CRB
2	<i>Jane Doe LS 484 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05824-CRB
3	<i>Jane Doe LS 4 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05861-CRB
4	<i>Jane Doe LS 274 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05902-CRB
5	<i>Jane Doe LS 359 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05908-CRB
6	<i>Jane Doe LS 304 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05914-CRB
7	<i>Jane Doe LS 369 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05915-CRB
8	<i>Jane Doe LS 269 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05922-CRB
9	<i>Jane Doe LS 93 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05925-CRB
10	<i>Jane Doe LS 7 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05926-CRB
11	<i>Jane Doe LS 504 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05928-CRB
12	<i>Jane Doe LS 180 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05936-CRB
13	<i>Jane Doe LS 119 v. Uber Technologies, Inc., et al.</i>	3:24-cv-05937-CRB
14	<i>Jane Doe LS 197 v. Uber Technologies, Inc., et al.</i>	3:24-cv-06003-CRB
15	<i>Jane Doe LS 314 v. Uber Technologies, Inc., et al.</i>	3:24-cv-06016-CRB
16	<i>Jane Doe LS 188 v. Uber Technologies, Inc., et al.</i>	3:24-cv-06022-CRB
17	<i>Jane Doe LS 230 v. Uber Technologies, Inc., et al.</i>	3:24-cv-06026-CRB
18	<i>Jane Doe LS 209 v. Uber Technologies, Inc., et al.</i>	3:24-cv-06033-CRB
19	<i>Jane Doe LS 534 v. Uber Technologies, Inc., et al.</i>	3:24-cv-07142-CRB
20		

21 I declare under penalty of perjury that the foregoing is true and correct.

22 Executed on April 16, 2025, in Atlanta, Georgia.

24 /s/Michael B. Shortnacy
 25 Michael B. Shortnacy